

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

EDNY Docket /File No. 20-cv-5380

JOSE GUTIERREZ, JUAN MONTENEGRO, NOEL BAQUEDANO,
WILLIAM RODRIQUEZ, ANGEL RODRIGUEZ and HAROLD VENTURA,
On behalf of themselves and other similarly situated,

PLAINTIFFS,

DEFENDANT'S FIRST SET OF
RESPONSES TO PLAINTIFF
INTERROGATORIES

-against-

DAVINCI'S RESTAURANT & LOUNGE, CHRISTINA BOUZELAS, GEORGE
BOUZELAS, JOSE BONILLA, JAVED ALI and ABC CORP. d/b/a DAVINCI'S
RESTAURANT & LOUNGE

DEFENDANTS

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Pursuant to Rules 33 and 34 of the Federal Rules of Civil Procedure the defendant
Christina Bouzalas answers, under oath, the following plaintiff's Interrogatories as stated
herein

1. INTERROGATORY NO. 1: For the time commencing six years before the date of the
complaint until the date of your response, describe in detail Your complete employment
history. Include in your description all positions held, responsibilities and name of company.
If a business entity, state the current and any past legal forms of the business entity and
identify all current and past owners, partners, directors, and shareholders of the business
entity, and all current and past names as which the business entity is or was doing business.

INTERROGATORY NO. 17: Identify all persons to have any knowledge of or information about the subject matter of this litigation and set forth the subject of each individual's knowledge information.

X

17. Besides the defendants in this action, the following persons have knowledge relevant to the claims: Michael Mistretta, owner of Frantoni Pizzeria, was employer of Noel Baquedano from March 2016 to July 2019. Jimmy Ochoa, former employee of Davinci, knowledge that Harold Ventura did not work for Davinci from 2016-August 26, 2019, Celso Lopez, former employee, knowledge that Harold Ventura did not work for Davinci from 2016 to August 26, 2019, Michael Mahoney, former employee of defendant, knowledge that Harold Ventura did not work for defendant Davinci from 2016 to August 26, 2019.

INTERROGATORY NO. 18: Describe in detail, from the time commencing six years before the date of the complaint until the date of your response, who signed the Corporate annual and quarterly tax returns of Davinci's.

23. Defendant used corporate records to answer response 23, used timesheets to answer all responses regarding payment of plaintiffs.

INTERROGATORY NO. 25: Please detail your knowledge concerning Plaintiffs claims that a person contacted them Plaintiff about issues contained in this lawsuit and/or presented a letter as detailed in Plaintiff's Amended Complaint at ¶¶ 138-150.

24. Defendant has no knowledge regarding these issues.

Dated: August 23, 2022

Richmond Hill, New York 11419

A handwritten signature in black ink, appearing to read "Stephen C. Dachtera", is written over a horizontal line.

Stephen C. Dachtera Esq. as to Objections
Attorney for Defendant Christina Bouzalas
101-05 Lefferts Boulevard
Richmond Hill, N.Y 11419
718-849-7272

VERIFICATION

State of New York)
 : s
County of Queens)

I, Christina Bouzalas a defendant and as such has read the foregoing responses to Plaintiffs request for Interrogatories and know the contents thereof, the same is true to my own knowledge, except as to those matters therein alleged to be on information and belief, and as to those matters, I believe it to be true.

Dated: August 11, 2022

X Christina Bouzalas
Christina Bouzalas

Sworn to before me on this
11 day of August 2022

Ronald Krome
NOTARY PUBLIC

Ronald Krome
State of New York Notary Public
NO. 01KR5015107
Certified in Nassau County
Commission Expires 07/12/2028
2022